

## **REMARKS**

Claims 1 and 61 have been amended to correct an antecedent basis issue. Claims 1-90 remain pending in the application. Reconsideration is respectfully requested in light of the following remarks.

### **Section 112, Second Paragraph, Rejection:**

The Office Action rejected claims 1 and 61 under 35 U.S.C. § 112, second paragraph as indefinite, specifically for lacking sufficient antecedent basis for the limitation “dynamically changing the host system’s fabric device configuration in response to said receiving an event.” Claims 1 and 61 have been amended to correct this issue, and Applicant submits that this rejection has been overcome.

### **Section 103(a) Rejection:**

The Office Action rejected claims 1-90 under 35 U.S.C. § 103(a) as being unpatentable over Casper et al. (U.S. Patent 6,687,766) (hereinafter “Casper”) in view of Blumenau et al. (U.S. Patent 6,421,711) (hereinafter “Blumenau”). Applicant traverses as set forth in greater detail in the following remarks.

With respect to claim 1, neither Casper nor Blumenau, taken individually or in combination, teach or suggest all of the limitations of Applicant’s claim. Specifically, the cited art does not teach or suggest a method for handling fabric state changes, comprising receiving an event indicating a fabric state change for one or more host adapter ports and dynamically changing the host system’s fabric device configuration in response to said receiving an event, wherein dynamically changing comprises bringing online or taking offline one or more fabric devices for the one or more host adapter ports for the host system.

The Examiner relies on Casper to disclose the limitation of receiving an event indicating a fabric state change, and acknowledges that Casper does not teach or suggest any aspect of dynamically changing a host system's configuration in response to such a fabric state change event. The Examiner relies on Blumenau, col. 33 line 10 – col. 34, line 50 to teach this limitation. However, the combination of Casper and Blumenau fails to teach or suggest Applicant's claimed invention on a number of counts.

**The logical volume configuration changes of Blumenau have nothing to do with fabric state change events, as recited in claim 1.** At col. 33, lines 29-40, Blumenau explicitly discloses that “a host application may need additional storage volumes, or may no longer need storage volumes allocated to it.” Responsively, the host of Blumenau may issue “mount” or “unmount” commands for those volumes. However, an application adding or releasing storage volumes based on its own operational requirements for such volumes is not at all suggestive of changing a host system's fabric device configuration in response to receiving an event indicating a fabric device state change. In this discussion, Blumenau appears to assume that a storage subsystem is capable of responding to any request to mount or unmount volumes received from a host system, and does not discuss any aspect of the operational state of the devices underlying those volumes with respect to host-generated configuration events.

**The host-side state change events of Blumenau have nothing to do with fabric state change events.** At col. 34, line 65 – col. 35, line 4, Blumenau discloses the operation of a storage subsystem (which encompasses any storage devices that may be present) in response to a host being disconnected from the storage subsystem. However, this is precisely the opposite of dynamically changing the host system's fabric device configuration in response to a fabric state change event as recited in claim 1. That is, Blumenau is directed to the problem of a storage subsystem modifying its configuration in response to a change in state of some host connected to the storage subsystem. However, this is entirely different from the problem of changing the fabric device configuration of a host system in response to a fabric state change event. In fact, Blumenau confines his discussion to the operation of the storage subsystem and treats the

hosts as opaque entities whose operation is peripheral to that of the storage subsystem. Aside from the application-driven volume configuration requests described above, and the general reading and writing of data to storage volumes, it is unclear that the hosts of Blumenau bear any significant relationship to the configuration and operation of the storage subsystem. This is clearly distinct from claim 1, in which it is the host system's configuration that is subject to modification in response to a fabric state change event.

**Further, Blumenau explicitly acknowledges that his disclosures have nothing to do with fabric state change events.** At col. 34, lines 53-55, Blumenau notes that “If a fabric exists, the problem of propagating the [fabric controller state change] information through a fabric switch has not yet been solved by the FC [Fibre Channel] standard.” In the face of such an explicit acknowledgement, it is impossible to read the disclosures of Blumenau regarding host-side events as being at all applicable to events arising from the fabric interface. Thus, Blumenau provides no suggestion or motivation for combining his host-side event detection and configuration techniques with the teachings of Casper. In fact, Blumenau suggests that such a combination is not feasible.

Since the Examiner has acknowledged that Casper does not teach or suggest any aspect of dynamically changing a host system's configuration in response to a fabric state change event, and the Blumenau reference itself acknowledges that Blumenau has nothing to do with fabric state change events, the combination of Casper and Blumenau clearly fails to teach or suggest the explicit relationship between receiving an event indicating a fabric state change for one or more host adapter ports and dynamically changing the host system's fabric device configuration in response to receiving such an event that is recited in Applicant's claim 1. Therefore, Applicant submits that the rejection of claim 1 is not supported by the teachings of the cited art. Similar arguments apply to claims 31 and 61, each of which recites limitations similar to claim 1.

Further, Applicant notes that numerous ones of the dependent claims recite additional distinctions over the cited art. However, since the rejection of the independent

claims has been shown to be unsupported by the cited art, no further discussion of the dependent claims is necessary at this time.

## CONCLUSION

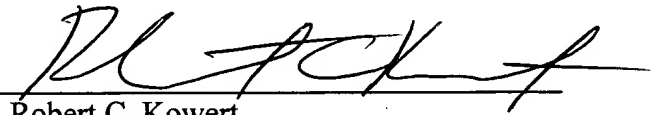
Applicant submits the application is in condition for allowance, and notice to that effect is respectfully requested.

If any extension of time (under 37 C.F.R. § 1.136) is necessary to prevent the above referenced application from becoming abandoned, Applicant hereby petitions for such extension. If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5181-83600/RCK.

Also enclosed herewith are the following items:

- ☒ Return Receipt Postcard
- ☐ Petition for Extension of Time
- ☐ Notice of Change of Address
- ☐ Fee Authorization Form authorizing a deposit account debit in the amount of \$  
for fees (      ).
- ☐ Other:

Respectfully submitted,



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